

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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In re: Equifax, Inc. Customer Data Security Breach Litigation	) MDL Docket No. 2800
	) Case No.: 1:17-md-2800-TWT
	)
	) CONSUMER ACTIONS
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**APPLICATION OF ROXANNE B. CONLIN FOR PLAINTIFFS' STEERING COMMITTEE**

In January 2016, The Honorable Charles Breyer held a hearing on selection of lawyers for service on the Volkswagen Emission Fraud Plaintiffs' Steering Committee. I had never before had any interest in nor applied for a position in multidistrict litigation but found the conduct of Volkswagen to be so reprehensible that I wanted to participate. I served on the Trial and Discovery Committee and once the case was settled, I served on the Consumer Contact Committee. I was selected from a group of applicants of approximately 150 firms. I am also currently serving in the Plaintiff's Steering Committee for the CenturyLink Billing Dispute Litigation, also a nationwide class action.

I have practiced law for nearly 52 years, both as a public official and in private practice. In both capacities, I have handled class actions and other complex litigation. Most recently, I am representing a putative class of Iowa's most vulnerable adults who are on Medicaid and have had their benefits arbitrarily

slashed by the private for-profit company now handling Iowa's Medicaid program. I argued against the Defendant's Motion to Dismiss and in favor of our Motion to Certify the Class and to Grant a Preliminary Injunction last week. The case is pending in federal court before Judge Rebecca Goodgame Ebinger. I have also filed a complaint with the Iowa Civil Rights Commission on behalf of a class of women who are supervisors of clerical workers and who are systematically underpaid for their services as compared to all other types of supervisors.

*Godfrey v. State of Iowa, et al.*, decided June 30, 2017 by the Iowa Supreme Court, held that the Iowa Constitution provided a remedy in damages to an individual whose state constitutional rights were violated. 898 N.W.2d 844 (Iowa 2017). I represent Christopher Godfrey, the only openly gay executive officer of this state, whose salary was slashed by more than one third by the new governor when Christopher refused to resign as Workers' Compensation Commissioner midway through his 6-year term.

Early in my career, I was an Assistant Attorney General for the State of Iowa. I served as liaison to private counsel for a number of nationwide class actions including Tetracycline, Ampicillin, plumbing fixtures, copper tubing and others. Among the criminal cases I prosecuted as lead counsel was one against dozens of tool dealers who went to the trouble of reprinting parts books with prices

escalated between 10 and 25 percent based on their collusion. Another case involved the fixing of cattle prices by a meat packer. All criminal cases resulted in convictions.

In 1977, I was appointed United States Attorney for the Southern District of Iowa, only the second woman ever confirmed by the Senate to serve in that capacity. While I served, I was also elected president of the Federal Executive Counsel and served on the Attorney General's Advisory Committee of the United States Attorneys and as a consultant to the Attorney General's Advocacy Institute.

After running unsuccessfully for governor of Iowa in 1982, I entered the private practice of law. I have been exclusively a plaintiff's trial lawyer since 1983 and have had my own law firm since 1991. I have handled hundreds of personal injury cases including products and medical malpractice. I also handle employment discrimination, fraud, and constitutional cases. I have tried dozens of such cases to verdict in front of juries over the years. Several of the employment discrimination cases have been class actions, where I have served as lead counsel and trial counsel. In a racial harassment case against *Alcoa, Cooper, et al v. Aluminum Co. of America*, No. 3:95-cv-10074-REL (S.D. Iowa September 11, 1997), we pioneered many of the concepts now routinely used in such cases, including an in-facility quick response team designed to immediately resolve complaints of race

discrimination; a committee of community leaders to review cases not resolved by the quick response team; and individual mediation of all damage claims. Recently, we brought a race discrimination case against a hospital which was also resolved by settlement which included the use of an African American community leader as the final arbiter of individual claims and empowered him to order job placement of those whose applications were rejected or the rehiring of those who were unlawfully fired, *Meeks, et al v. Allen Memorial Hospital Corp.*, LACV 114860 (Iowa Dist. filed December 16, 2010). I have handled several other class actions.

From 2000 to 2007, I served as co-lead counsel in the case of *Comes, et al. v. Microsoft*, a consumer class action on behalf of Iowans who purchased computers equipped with Microsoft operating systems and software. Richard Hagstrom was my co-lead counsel. The case went to the Iowa Supreme Court three times. The first appeal from the granting of a motion to dismiss was the first appellate case in the nation which found that, despite the fact that Iowa was not a repealer state, Illinois Brick did not apply and granted consumers the right to sue for antitrust violations. *Comes v. Microsoft Corp.*, 646 N.W.2d 440 (Iowa 2002). It went to trial on November 13, 2006 and was settled on February 14, 2007. The settlement was twice as much per capita as any other statewide class action against Microsoft and the only such settlement that included cash for consumers. The

agreement also permitted people to apply for up to \$100.00 by Internet with no proof of purchase, a provision which has been frequently copied since in many other consumer class actions.

In 2004, I was asked to come into the Minnesota Microsoft case shortly before trial and with Co-counsel Mr. Hagstrom, I tried the case to a jury for almost 8 weeks at which time it, too, was settled for what was then the largest per capita amount. *Gordon v. Microsoft*, 2004 WL 4968046, Nos. 00-5994, 03-4162 (Minn. Dist. July 2, 2004). I was also lead counsel for the class in the case of *Cohen v. Mid-American Energy*, a securities fraud action and I represented Iowa farmers in the Star Link class action for corn contaminated by GMOs. *Cohen v. Berkshire Hathaway, Inc.*, 2000 WL 35554611, No. CL 81833 (Iowa Dist. September 27, 2000).

I am co-editor of a six-volume set of trial manuals published by West Publishing called Litigating Tort Cases. I have written chapters in books and articles on all aspects of trial. I have spoken across the country on similar topics. In 1992, I was elected the first woman president of the Association of Trial Lawyers America now known as the American Association of Justice. I am also an elected member of the Inner Circle of Advocates, the International Association of Trial Lawyers, the Iowa Academy of Trial Lawyers and Litigation Counsel of America,

among others. I have received professional and community honors and awards and served as president or on the board of directors of several organizations both legal and charitable.

I bring decades of trial experience, along with specific expertise in fraud and class action cases and in all aspects of trial preparation. I am able and willing to devote the necessary time and effort immediately to this litigation. I have demonstrated the ability to work cooperatively with both fellow plaintiffs' lawyers and with defense counsel. I have access to all resources necessary to successfully do so.

I seek a position on the steering committee. My experience in the trial and settlement of cases will be helpful in processing this matter, whatever direction it follows.

Filed in conjunction with this motion is an abbreviated Curriculum Vitae.

Respectfully submitted this 2nd day of February 2018,

/s/ Roxanne Conlin  
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**CERTIFICATE OF COMPLIANCE WITH RULE 5.1(B)**

I hereby certify that, pursuant to Local Rule 5.1, the foregoing Application was prepared in accordance with LR 5.1(B). Specifically, the application was prepared in Times New Roman 14-point font, double-spaced, with a top margin of 1.5 inches and all other margins of 1 inch.

/s/ David Denison  
David Denison  
Roxanne Conlin & Associates, P.C.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Application was filed via the Court's CM/ECF system which automatically sends notice to all participating counsel.

/s/ David Denison  
David Denison  
Roxanne Conlin & Associates, P.C.